

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GABRIELLE DOUYON,

Plaintiff,

v.

NY MEDICAL HEALTH CARE, P.C.,  
SEYMOUR SCHNEIDER, *a/k/a SY SCHNEIDER*,  
KOUROSH GOLYAN, *a/k/a DAVID GOLYAN*,  
NATHAN KHAIMOV,  
FARAIDOON DANIEL GOLYAN, M.D.

Defendants.

**NOTICE OF MOTION FOR  
PARTIAL SUMMARY  
JUDGMENT ON PLAINTIFF'S  
FIRST AND SECOND CAUSES  
OF ACTION**

Index No.: 10-cv-3983

Hon. Sandra J. Feuerstein  
Hon. A. Kathleen Tomlinson

**NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT ON PLAINTIFF'S  
FIRST AND SECOND CAUSES OF ACTION**

**PLEASE TAKE NOTICE**, that upon the Memorandum of Law in Support of Plaintiff's Motion For Partial Summary Judgment on Plaintiff's First and Second Causes of Action pursuant to Fed. R. Civ. P. 56, the Declaration of Daniel Schlanger, Esq., and all other Exhibits and papers attached hereto, Plaintiff will move this Honorable Court located at United States Courthouse, Southern District of New York, 100 Federal Plaza, Central Islip, NY 11722, at a time to be determined by the Court for an Order granting Plaintiff's aforesaid motion. Plaintiff moves on both causes of action with regard to liability only. With regard to Plaintiff's Second Cause of Action, Plaintiff moves as against Defendant NY Medical Health Care, P.C., only.

Respectfully Submitted,



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**CERTIFICATE OF SERVICE**

1. I, Daniel A. Schlanger, an attorney, hereby certify under penalty of perjury that on November 7, 2011, I caused the following documents to be served upon Defendants:

**NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT ON PLAINTIFF'S  
FIRST AND SECOND CAUSES OF ACTION AND SUPPORTING PAPERS**

2. I served the above referenced documents by sending the same in a sealed envelope with pre-paid postage thereon for deposit into a depository of the United States Postal Service to Defendants' counsel at the address listed below:

Revaz Chachanashvili & Associates  
*Counsel for Defendants*  
108-18 72<sup>nd</sup> Avenue  
2<sup>nd</sup> Floor  
Forest Hills, NY 11375

Dated: Nov. 7, 2011  
White Plains, New York



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